

ORIGINAL  
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U.S. DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

OCT 15 2003

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

LUTHER B. THOMAS, Clerk  
By: Jackson  
Deputy Clerk

IN RE: TRI-STATE :  
CREMATORY LITIGATION : MDL DOCKET NO. 1467

This relates to all actions.

**R. DUDLEY BARTON & SON FUNERAL HOME, INC.'S,**  
**SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND**  
**GARDENS, INC.'S, ERWIN-PETITT FUNERAL HOME, INC.'S,**  
**RYAN FUNERAL HOME INC.'S, R. D. MOORE FUNERAL HOME INC.'S,**  
**TAYLOR FUNERAL HOME OF CHATTANOOGA, INCORPORATED'S,**  
**AND THOMAS & SON FUNERAL HOME, INC.'S.**  
**NOTICE OF FILING ORIGINAL DISCOVERY**

COME NOW R. DUDLEY BARTON & SON FUNERAL HOME, INC.,  
SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND GARDENS, INC.,  
ERWIN-PETITT FUNERAL HOME, INC.'S, RYAN FUNERAL HOME INC., R.  
D. MOORE FUNERAL HOME, INC., TAYLOR FUNERAL HOME OF  
CHATTANOOGA, INCORPORATED, and THOMAS & SON FUNERAL HOME,  
INC., Defendants in the above-styled civil action, and pursuant to Fed. R. Civ. P. 56,  
hereby file the following original discovery:

1. Defendant Sequatchie Valley Memorial Funeral Home And Gardens,  
Inc.'s, Second Supplemental Responses To Plaintiffs' First Master Set  
Of Interrogatories and First Master Set Of Document Requests To

Funeral Home Defendants;

2. Defendant Erwin-Petitt Funeral Home, Inc.'s, Second Supplemental Responses To Plaintiffs' First Master Set Of Interrogatories and First Master Set Of Document Requests To Funeral Home Defendants;
3. Defendant R. Dudley Barton & Son Funeral Home Inc.'s, Supplemental Responses To Plaintiffs' First Master Set Of Interrogatories and First Master Set of Document Requests To Funeral Home Defendants;
4. Defendant Ryan Funeral Home Inc.'s, Supplemental Responses To Plaintiffs' First Master Set Of Interrogatories and First Master Set of Document Requests To Funeral Home Defendants;
5. Defendant R. D. Moore Funeral Home Inc.'s, Second Supplemental Responses To Plaintiffs' First Master Set Of Interrogatories and First Master Set of Document Requests To Funeral Home Defendants;
6. Defendant Taylor Funeral Home Of Chattanooga, Incorporated's Second Supplemental Responses To Plaintiffs' First Master Set Of Interrogatories and First Master Set of Document Requests To Funeral Home Defendants; and
7. Defendant Thomas & Son Funeral Home, Inc.'s, Responses To Plaintiffs' First Master Set Of Interrogatories and First Master Set of

Document Requests To Funeral Home Defendants.

Respectfully submitted this 15 day of October, 2003.

Respectfully Submitted,

GOODMAN, MCGUFFEY, LINDSEY &  
JOHNSON, LLP

By: Edward H. Lindsey, Jr.  
EDWARD H. LINDSEY, JR.  
Georgia State Bar No. 453075

By: T. Jeffery Lehman  
T. JEFFERY LEHMAN  
Georgia State Bar No. 445725

By: Robert A. Lusk  
ROBERT A. LUSKIN  
Georgia State Bar No. 004383

Attorneys for Defendants R. Dudley Barton &  
Son Funeral Home, Inc., Sequatchie Valley  
Memorial Funeral Home and Gardens, Inc.,  
Ryan Funeral Home Inc., R. D. Moore  
Funeral Home, Inc., Taylor Funeral Home of  
Chattanooga, Incorporated, and Thomas &  
Son Funeral Home, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

IN RE: TRI-STATE ) MDL DOCKET NO. 1467  
CREMATORY LITIGATION )  
)

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**CERTIFICATE OF FONT AND POINT SIZE**

The font and point style used in this **R. DUDLEY BARTON & SON FUNERAL HOME, INC.'S, SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND GARDENS, INC.'S, ERWIN-PETITT FUNERAL HOME, INC.'S, RYAN FUNERAL HOME INC.'S, R. D. MOORE FUNERAL HOME INC.'S, TAYLOR FUNERAL HOME OF CHATTANOOGA, INCORPORATED'S, AND THOMAS & SON FUNERAL HOME, INC.'S, NOTICE OF FILING ORIGINAL DISCOVERY** is Times New Roman 14 Point.

This 15 day of October, 2003.

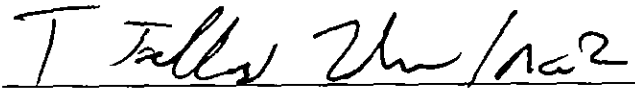
Respectfully Submitted,

GOODMAN, MCGUFFEY, LINDSEY &  
JOHNSON, LLP

  
EDWARD H. LINDSEY, JR.  
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Attorneys for Defendants R. Dudley Barton & Son Funeral Home, Inc., Sequatchie Valley Memorial Funeral Home and Gardens, Inc., Ryan Funeral Home Inc., R. D. Moore Funeral Home, Inc., Taylor Funeral Home of Chattanooga, Incorporated, and Thomas & Son Funeral Home, Inc.

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**CERTIFICATE OF SERVICE**

This is to certify that I have this date served upon counsel in the above captioned lawsuit a copy of the foregoing **R. DUDLEY BARTON & SON FUNERAL HOME, INC.'S, SEQUATCHIE VALLEY MEMORIAL FUNERAL HOME AND GARDENS, INC.'S, ERWIN-PETITT FUNERAL HOME, INC.'S, RYAN FUNERAL HOME INC.'S, R. D. MOORE FUNERAL HOME INC.'S, TAYLOR FUNERAL HOME OF CHATTANOOGA, INCORPORATED'S, AND THOMAS & SON FUNERAL HOME, INC.'S, NOTICE OF FILING ORIGINAL DISCOVERY** by depositing same in the United States Mail with proper postage affixed thereon and addressed to:

Robert H. Smalley, III, Esq.  
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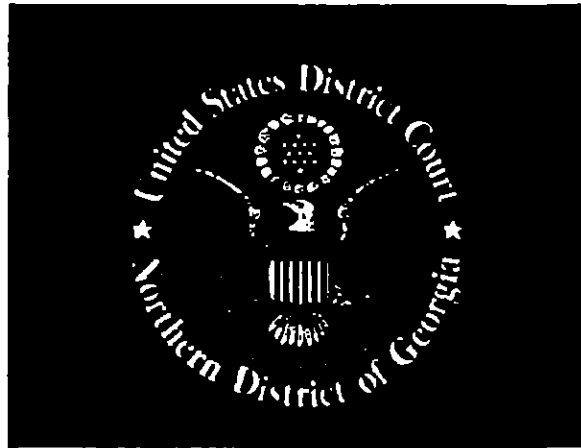
This 15 day of October, 2003.

By: 

EDWARD H. LINDSEY, JR.

Georgia State Bar No. 453075

Attorneys for Defendants R. Dudley Barton &  
Son Funeral Home, Inc., Sequatchie Valley  
Memorial Funeral Home and Gardens, Inc.,  
Ryan Funeral Home Inc., R. D. Moore  
Funeral Home, Inc., Taylor Funeral Home of  
Chattanooga, Incorporated, and Thomas &  
Son Funeral Home, Inc.



## ATTACHMENTS TO

DOCKET # 598

### COULD NOT BE SCANNED BECAUSE OF THE FOLLOWING:

- ☐ Legal Size Documents
- ☐ Large Exhibits
- ☒ Double Sided Documents
- ☒ Other to many pages (discovery)

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(To be scanned in the place of the above attachments.)